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VIA ELECTRONIC FILING

Hon. Robert M. Levy, USMJ
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: *U.S. v. Cherwitz, et al.*, No. 23-cr-146

Dear Judge Levy:

Defendants are in receipt of this Court's November 12, 2024, scheduling order rescheduling the November 20, 2024, conference to tomorrow, November 13 at 1:00 PM. Unfortunately, Defendants and their attorneys are unavailable on November 13 to appear for this conference due to other professional obligations.

Specifically, both of Ms. Daedones' trial attorneys just landed in Chicago, Illinois for two full days of back-to-back depositions in a § 1983 case *Munoz v. Guevara, et. al.*, 23-cv-03210 pending in the United States District Court for the Northern District of Illinois. These depositions have been scheduled for over a month, involve several attorneys and witnesses who have cleared their schedules and non-refundable travel costs. Moreover, the case has a firm fact discovery deadline that would not allow to reschedule to these depositions in any event.

Additionally, Ms. Cherwitz, who was in New York, just traveled to Washington D.C. with pretrial Services given proper notice and will not be returning to New York until Thursday afternoon. Furthermore, Ms. Cherwitz's lead counsel, Imran Ansari has a prescheduled deposition that has already been rescheduled and cannot be rescheduled again at this late juncture.

As such, the parties respectfully propose this Court hold this conference on Friday, November 15 at 9 AM (or earlier), prior to the scheduled status hearing before District Court Judge Gujarati at 9:30 AM. All counsel and Defendants are available at that time.

Respectfully Submitted,
/s/ JENNIFER BONJEAN
/s/ IMRAN H. ANSARI